



**BIG  
CREEK**

*"Growing Redwoods for the Future"*

Board of Forestry  
and Fire Protection  
Attn: George Gentry  
Executive Officer  
P.O. Box 944246  
Sacramento, Ca. 94244-2460

October 29, 2007

**RE: 14 CCR 895.1 Late Successional Forest Stands [All Districts]**

Late Successional Forest Stands means stands of dominant and predominant trees that meet the criteria of WHR class 5M, 5D, or 6 with an open, moderate or dense canopy closure classifications, often with multiple canopy layers, and are at least 20 acres in size. Functional characteristics of late succession forests include large decadent trees, snags and large down logs.

Mr. Gentry,

It has come to my attention that the Policy Committee of the State Board of Forestry and Fire Protection is currently accepting comments from the regulated public in regards to the interpretation and implementation of specific regulatory standards within the California Forest Practices Act. I request that that Policy Committee address the current application of Late Successional Forest Stands (LSF) pursuant to 14 CCR 895.1, particularly as it relates to the recently published "Clarification of the Measurement of the California Wildlife Habitat Relationship (CWHR) System Size Class 5 and 6 for Tree Habitats" by the California Department of Fish and Game (which can be located at [http://www.dfg.ca.gov/biogeodata/cwahr/pdfs/CWHR\\_TechReport32.pdf](http://www.dfg.ca.gov/biogeodata/cwahr/pdfs/CWHR_TechReport32.pdf)).

Upon publishing the clarification paper, The California Department of Fish and Game (DFG), without input from the regulated public or BOF, has revised the accepted and past application of the CWHR system as it relates to LSF. The determination and protection of the resources primarily associated with LSF is mandated to CAL-FIRE and any revisions to the implementation of this rule should be subject to full public and BOF review.

Resolution to this inquiry may be found in a thorough review of the Administrative Record for the adoption of Late Successional Forest Stand Rule package (from the early 1990's) followed by BOF adopted findings issued to CAL-FIRE clarifying the intent of the rule package and the procedures followed in LSF determinations.

Sincerely,

Matt Dias, RPF #2773  
Big Creek Lumber Company  
3564 Highway 1  
Davenport, Ca. 95017